Exhibit 36

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Page 1
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 2
     UNITED STATES DISTRICT COURT
     SOUTHERN DISTRICT OF NEW YORK
 3
    ROBYN ABRAHAM,
 4
                                  Plaintiff, :
 5
                   - against -
6
     ABBY LEIGH in her individual capacity
7
     and as Executrix of the ESTATE OF
     MITCH LEIGH, THE VIOLA FUND, ABBY LEIGH
     LTD, MARTHA WASSERMAN in her individual
8
     capacity and as Executrix of the ESTATE
     OF DALE WASSERMAN, HELLEN DARION, in her
     individual capacity and as Executrix of
     the ESTATE OF JOSEPH DARION, and
10
     ALAN HONIG,
11
                                 Defendants. :
12
13
                           666 Fifth Avenue
                           New York, New York
14
                           January 17, 2019
15
                            9:39 a.m.
16
17
                VIDEOTAPED EXAMINATION BEFORE
18
     TRIAL of ROBYN ABRAHAM, the Plaintiff herein,
19
     taken by the Defendants, pursuant to Court
20
     Order, held at the above-mentioned time and place,
21
    before Michelle Lemberger, a Notary Public of
2.2
    the State of New York.
23
24
25
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	valluar y	, ,	2019 22 to 25
	Page 22		Page 24
1	Robyn Abraham	1	Robyn Abraham
2	answered. That's it. She's answered	2	Wasserman?
3	the question.	3	A. I believe it was Dr. Wayne Dyers.
4	MR. LAFAYETTE: I have not	4	Q. And can you tell me the
5	asked that question before.	5	circumstances of Mr Dr. Dyers introducing
6	MS. SHIN: Yes or not.	6	you to Ms. Wasserman?
7	MR. LAFAYETTE: My question	7	MS. SHIN: Objection to form.
8	was and I'll ask the court	8	A. I don't understand the question.
9	reporter to read it back.	9	Q. Okay.
10	(Whereupon, at this time, the requested	10	THE WITNESS: Can I get some
11	portion was read by the reporter.)	11	tea? I've been kind of asking and
12	MS. SHIN: Same objection.	12	I'm kind of wired in here.
13	It's been answered.	13	MS. SHIN: Let's take a break.
14	A. I'm deferring to my counsel.	14	Is there anything that she can drink?
15	MR. LAFAYETTE: Are you	15	MR. LAFAYETTE: Let's go off
16	directing your client not to answer	16	the record.
17	the question?	17	VIDEOGRAPHER: It is 10:00 a.m.
18	MS. SHIN: No. She's already	18	and we are off the record.
19	answered it.	19	(Discussion held off the
20	A. I've answered it.	20	record.)
21	Q. Do you have any document in which	21	VIDEOGRAPHER: The time is
22	Ms. Bases gives you permission to communicate	22	10:02 a.m. and we're back on the
23	with Martha Wasserman?	23	record.
24	MS. SHIN: Objection.	24	BY MR. LAFAYETTE:
25	Foundation. Asked and answered.	25	Q. And after you were introduced to
1	Page 23	1	Page 25
1 2	Robyn Abraham	1 2	Robyn Abraham
2	Robyn Abraham Form.	2	Robyn Abraham Ms. Wasserman, did you have a discussion with
2 3	Robyn Abraham Form. A. I've answered the question.	2 3	Robyn Abraham Ms. Wasserman, did you have a discussion with her?
2 3 4	Robyn Abraham Form. A. I've answered the question. MS. SHIN: You can answer it,	2 3 4	Robyn Abraham Ms. Wasserman, did you have a discussion with her? A. No, not really.
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26 to 29

	Page 26		Page 28
1 2	Robyn Abraham know we were introduced and I recall that Dr.	1	Robyn Abraham
3	Dyers had recommended me because I knew him.	2	Q. In this e-mail, you mention that Man of La Mancha is your favorite musical, do you
4	He used to be on Public Television and I	4	see that?
5	worked at I worked for PBS in Miami where	5	A. Yes.
6	he used to appear.	6	Q. Is it your favorite musical?
7	Q. When you say he recommended you,	7	A. Yes.
8	could you explain what you mean by that?	8	Q. It in it you say you're Disney
9	A. He just recommended that Martha talk	9	trained, highly successful international
10	to me.	10	entertainment media attorney, solicitor, MBA.
11	Q. For any particular purpose?	11	Do you see that?
12	A. Well, he thought, Dr. Dyers thought	12	A. Yes.
13	I am very good at what I do, so he suggested	13	Q. And can you tell me what you mean by
14	Martha talk to me.	14	a Disney-trained entertainment media
15	Q. And did you have an occasion after	15	attorney?
16	the conference to communicate with	16	A. I think it's self explanatory, but
17	Ms. Wasserman?	17	what's the question?
18	A. Yes. She gave me her card and told	18	Q. What do you mean by Disney trained?
19	me to get in touch. And wanted to basically	19	A. I was trained by the general counsel
20	have a conversation of, you know, what I	20	of Disney.
21	thought would be good to restart Man of La	21	O. You worked for him?
22	Mancha, and I told her I'd think about it.	22	A. Yes. I worked for Joe Shapiro who
23	Q. And when did she say that to you?	23	was the Disney general counsel, correct.
24	A. During the conference.	24	Q. And you were outside counsel for
25	Q. And did you get back in touch with	25	Disney?
	Page 27		Page 29
1	Robyn Abraham	1	Robyn Abraham
2	Robyn Abraham her?	2	Robyn Abraham A. Correct, correct.
2 3	Robyn Abraham her? A. Well, she gave me her card and asked	2 3	Robyn Abraham A. Correct, correct. Q. And in what way did he train you?
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46 to 49

2 and she said she'd let me know. 3 Q. And isn't it correct that you state, 4 I'd be delighted to help you expand the bale 5 Masserman brand as well as to help you stage 6 his lesser-known plays in the U.S. and 7 intermational. 8 A. If that's what she wanted to do and 9 that's her request, then I said, If that's 10 what you want, I'm happy to halp. 11 Q. And when did she say that it was 12 something that she wanted? 12 something that she wanted? 13 A. A tlunch, the day we net. 14 Q. That's in benwer? 15 A. Correct. 16 Q. And Ms. Nasserman responded that she 17 swanted to have a few days to think about it, 18 correct? 19 A. I don't recall. 20 Q. Can you look at the top e-mail and 21 i'll ask if that refreshes your recollection. 21 (Witness peruses document.) 22 A. I don't know what you're asking me? 23 A. Mat's the question? 24 Page 47 25 Dack? 26 Q. It says that she wanted to have a few days to think about it, correct? 21 A. I don't recall. 22 (Whereupon, at this time, the requested) 23 A. Mat's the question? 24 Page 47 25 Dack? 26 Q. It says that she wanted to have a few days to think about it, correct? 27 A. I don't know what you're asking me? 28 A. I don't know what you're asking me? 29 A. I don't know what you're asking me? 30 (Whereupon, at this time, the requested) 31 A. A threath, the reporter. 32 (Whereupon, at this time, the requested) 33 A. A ch, yes, the first sentence. It 34 A. Ch, yes, the first sentence. It 35 A. Ch, yes, the first sentence. It 36 A. I'm looking at where that is. 37 Q. Carryou take a look at the next it. 38 A. I'm looking at where constant.) 39 (Witness peruses document.) 40 A. I don't recall. 41 C. Can you take a look at the next it. 42 C. Can you take a look at the next it. 43 A. Ch, yes, the first sentence. It. 44 A. I don't recall. 45 A. I don't recall. 46 A. I don't recall. 47 I'm and the day to think about it, correct? 48 A. I'm looking at where that is. 49 (Witness peruses document.) 40 A. I don't row. 41 A. I don't recall. 42 A. I don't recall. 43 A. Ch, yes, the first sen	1			
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7 international. 7 9 0 0 0 0 0 0 0 0 0				
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10 what you want, I'm happy to help. 11				
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12 something that she wanted? 13 A. At lunch, the day we met. 14 Q. That's in Denver? 15 A. Correct. 16 Q. And Ms. Wasserman responded that she wanted to have a few days to think about it, 17 Wanter freshes your recollection. 18 Q. Can you look at the top e-mail and 19 Page 47 11 ask if that refreshes your recollection. 20 (Witness peruses document.) 21 Pill ask if that refreshes your recollection. 22 A. What's the question? 23 A. What's the question? 24 MR. LAFAYETTE: Can you read it back? 25 back? 26 Darwy Abraham 27 A. I don't know what you're asking me? 28 A. I don't know what you're asking me? 29 A. Matever the e-mail says. 20 Q. It says that she wanted to have a few days to think about it, correct? 29 A. Matever the e-mail says. 20 Q. It says that she wanted to have a few days to think about it. Yourse, the first sentence. It says, May I have a few days to think about it. Yes, I see that. 20 Q. And notwithstanding, did you e-mail it. Yes, I see that. 21 Q. And notwithstanding, did you e-mail it. Wasserman to the first sentence. It of the reconstruction of the e-mail from Martha it. 22 A. I don't recall. 23 A. I don't recall. 24 A. I don't recall. 25 Back? Page 47 2 Back? Page 47 3 Robyn Abraham 4 Page 47 4 Page 47 5 A. Mhatever the e-mail says. 5 C. I saked you intit know what the e-mail saked the witness is this a true and correct copy of an e-mail that she received from Martha wasserman. 26 A. I don't recall. 27 A. I don't recall. 28 A. I don't recall. 29 A. I don't recall. 30 A. A contraction of the e-mail from Martha it. 31 G. A contraction of the e-mail from Martha it. 32 A. I don't know. I don't know what the e-mail as Abraham Exhibit 2 an e-mail that bear the Bates stamp ABR o00589. Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 2 for identification.) 32 A. I don't know. I don't know what the e-mail selectory of an e-mail that you vertee to Ms. Wasserman? 33 A. I don't recall. 34 A. I don't know. I don't know what the e-mail e-mail e-mail that you rece				-
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1	Page 50	1	Page 52
1	Robyn Abraham	1	Robyn Abraham
2	2013 at 3:18 p.m.?	2	MS. SHIN: Objection to form.
3	A. I don't know if it was received on	3	A. I don't understand the question.
4	that day. But I do recognize it as being	4	Q. Do you take the position in this
5	received at some point. It does look	5	action that you lost certain e-mails due to a
6	familiar.	6	crash of your server by Go Daddy?
7	Q. And is it a true and correct copy of	7	A. Well, I don't know what happened,
8	an e-mail that you received from Martha	8	but I do know everything I received I sent to
9	Wasserman?	9	counsel in London, and sent everything as
10	A. I believe so.	10	received as directed by Schillings Law Firm.
11	Q. And the subject line says, Re Denver	11	Q. Okay. And did you print out certain
12	lunch follow-up.	12	e-mails to send to the Schillings Law Firm?
13	Do you see that?	13	A. Did I print out I was told to
14	A. Yes, I do.	14	preserve the documents involving this case
15	Q. And when the subject line says Re,	15	Q. Okay.
16	is it your understanding that that refers to	16	A and forward to Schillings.
17	a response to another e-mail?	17	Q. And when was that?
18	A. I don't know what it refers to.	18	A. When was that? I think it occurred
19	Q. And do you know if this e-mail was	19	sometime in 2014, after Mitch died.
20	in response to an e-mail that you sent?	20	Q. And how did you preserve the
21	A. I don't know.	21	documents?
22	Q. Do you know if this e-mail was part	22	A. I forwarded them to Shillings Law
23	of a chain?	23	Firm.
24	A. I don't know.	24	Q. And how did you forward them to
25	Q. Now, Ms. Abraham, this is a document	25	them?
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1	Page 51 Robyn Abraham	1	Page 53 Robyn Abraham
1 2	=	1 2	=
	Robyn Abraham		Robyn Abraham
2	Robyn Abraham that was not produced by you in e-mail	2	Robyn Abraham A. Via zip file, via e-mail, as I was
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Page 56 Page 54 1 Robyn Abraham 1 Robyn Abraham 2 2 online, when the servers have been down and Q. Did you download the documents from 3 e-mails have been missing, something that's 3 your computer? publically reported. 4 4 MS. SHIN: Objection to form. 5 Q. And do you believe that due to some 5 A. I don't recall. 6 kind of a Go Daddy crash, that you lost 6 Q. Did an outside vendor download any 7 certain data? 7 documents from your computer? 8 A. I don't know what happened. I'm not 8 MS. SHIN: Objection to form. 9 an IT person. I don't know what happened. 9 A. I don't know. 10 Q. Did you delete any e-mails? 10 Q. Did you turn your computer over to A. No. 11 11 your attorney? 12 12 Q. Did you create any e-mails? MS. SHIN: Objection to form. 13 13 THE WITNESS: Am I supposed to 14 Q. Do you know when it was that you 14 answer? 15 lost this data? 15 MS. SHIN: If you understand 16 A. No. 16 the question. 17 Q. Do you know at what point in time 17 A. I don't understand what's being 18 you discovered this data was missing? 18 asked. 19 A. No. 19 Q. What kind of computers do you 20 Q. Have you been asked by your counsel 20 maintain? 21 for electronic versions of e-mail -- strike 21 MS. SHIN: Objection to form. 22 22 A. I have an iPad, I have phones, I had that. 23 Have you been asked by your counsel 23 Samsung phones. I don't know what kind of 24 for electronic versions of the e-mail that's 24 laptop I have. 25 been marked as Abraham Exhibit 2? 25 Q. Has your laptop been searched for Page 55 Page 57 1 Robyn Abraham 1 Robyn Abraham 2 2 MS. SHIN: If you could just documents in connection with this action? 3 rephrase that question so it doesn't 3 MS. SHIN: Objection to form. 4 sound like whatever her answer is 4 A. I don't know. 5 might be privileged. Q. Did you provide that laptop to your 6 Q. Have you searched your computer for 6 attorneys in this action? 7 electronic versions of the e-mail that's been 7 8 marked as Abraham Exhibit 2? 8 Q. And did you provide your iPad to the 9 9 A. I haven't, no. attorneys -- to your attorneys in this 10 Q. Do you believe that you produced to 10 action? your counsel all e-mails in e-mail format 11 11 A. No. that have to do with this action? 12 12 Q. And did you provide your phone to 13 A. I've produced everything to both 13 the attorneys in this action? 14 British and American counsel. 14 A. Yes. 15 O. Have third parties searched your 15 Q. Is the laptop that you provided to 16 computer for electronic data related to this your attorneys -- strike that. 16 17 action? 17 How long have you had the laptop 18 MS. SHIN: Objection to form. 18 that you provided to your attorneys in this 19 A. I don't know. 19 action? 20 Q. How did your attorney receive -- how 20 A. About a year. 21 did your attorney receive the documents that 21 Q. And prior to that, did you have you produced in this action? 22 22 another laptop? 23 MS. SHIN: Objection to form. 23 A. Yes. 24 A. I provided my attorneys with 24 Q. And what happened to that laptop? 25 whatever they requested. 25 A. It crashed.

	Gandary		
1	Page 58 Robyn Abraham	1	Page 60 Robyn Abraham
2	Q. When you say it crashed, can you	2	current laptop that you have now, you've had
3	tell me what you mean by that?	3	for a year?
4	A. Well, somebody slammed it in an	4	A. About that. I don't know exactly,
5	overhead bin and that was pretty much the end	5	but somewhere around that.
6	of it.	6	Q. And the between the time
7	Q. And that was on an airplane?	7	between the time that your laptop got crushed
8	A. Yes.	8	on American Airlines and one year ago, did
9	Q. Did you make a claim in connection	9	you have another laptop?
10	with that?	10	A. No. I used an iPad.
11	MS. SHIN: Objection to form.	11	Q. And for how long did you use an
12	A. Did I make a claim? No. Well, I	12	iPad?
13	might have. I think it was American I	13	A. On and off when I needed it.
14	might have. I don't remember.	14	Q. And do you recall from what years
15	MR. LAFAYETTE: I'm going to	15	you used this iPad?
16	call for production of any claim that	16	A. I don't remember.
17	she may have filed with American in	17	Q. Did you use did you have the iPad
18	connection with that incident.	18	in 2013?
19	MS. SHIN: We will take it	19	A. I don't think so.
20	under advisement.	20	Q. Did you have an iPad in 2014?
21	Q. And since what kind of laptop was	21	A. I don't exactly remember.
22	it that	22	Q. Did you begin using the iPad after
23	A. I don't know. All I know is, it was	23	your laptop got crushed on American Airlines?
24	white.	24	A. Yes.
25	Q. And when did this incident happen	25	Q. And do you know approximately for
L		1	
1	Page 59 Robyn Abraham	1	Page 61 Robyn Abraham
1 2		1 2	
	Robyn Abraham		Robyn Abraham
2	Robyn Abraham with American Airlines?	2	Robyn Abraham how many years you went without a laptop
2 3	Robyn Abraham with American Airlines? A. I don't remember.	2 3	Robyn Abraham how many years you went without a laptop computer?
2 3 4	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately?	2 3 4	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a
2 3 4 5	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No.	2 3 4 5	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know
2 3 4 5 6	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013?	2 3 4 5 6	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three.
2 3 4 5 6 7	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes.	2 3 4 5 6 7	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you
2 3 4 5 6 7 8	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop	2 3 4 5 6 7 8	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads?
2 3 4 5 6 7 8	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016?	2 3 4 5 6 7 8 9	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one.
2 3 4 5 6 7 8 9	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No.	2 3 4 5 6 7 8 9	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched
2 3 4 5 6 7 8 9 10	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop	2 3 4 5 6 7 8 9 10	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys
2 3 4 5 6 7 8 9 10 11 12	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident	2 3 4 5 6 7 8 9 10 11	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No.
2 3 4 5 6 7 8 9 10 11 12 13	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No.	2 3 4 5 6 7 8 9 10 11 12 13	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided	2 3 4 5 6 7 8 9 10 11 12 13 14	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing was. I think it was sometime after Mitch	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been marked as Abraham Exhibit 2, do you believe
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing was. I think it was sometime after Mitch died, but that's the best I can recall.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been marked as Abraham Exhibit 2, do you believe this is an authentic e-mail?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing was. I think it was sometime after Mitch died, but that's the best I can recall. Q. If you provided documents to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been marked as Abraham Exhibit 2, do you believe this is an authentic e-mail? A. I recall the contents, and I do
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing was. I think it was sometime after Mitch died, but that's the best I can recall. Q. If you provided documents to Schillings, would it have been through that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been marked as Abraham Exhibit 2, do you believe this is an authentic e-mail? A. I recall the contents, and I do believe it is authentic, yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing was. I think it was sometime after Mitch died, but that's the best I can recall. Q. If you provided documents to Schillings, would it have been through that particular laptop?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been marked as Abraham Exhibit 2, do you believe this is an authentic e-mail? A. I recall the contents, and I do believe it is authentic, yes. Q. And this is not a document that you
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing was. I think it was sometime after Mitch died, but that's the best I can recall. Q. If you provided documents to Schillings, would it have been through that particular laptop? A. I don't recall.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been marked as Abraham Exhibit 2, do you believe this is an authentic e-mail? A. I recall the contents, and I do believe it is authentic, yes. Q. And this is not a document that you typed?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham with American Airlines? A. I don't remember. Q. Do you know approximately? A. No. Q. Was it after 2013? A. Oh, yes. Q. And did you use any other laptop between 2013 and 2016? A. No. Q. After 2013, did you use a desktop computer? A. No. Q. Do you know if this incident involving your laptop getting crushed on American Airlines occurred after you provided documents to Schillings? A. I don't know exactly what the timing was. I think it was sometime after Mitch died, but that's the best I can recall. Q. If you provided documents to Schillings, would it have been through that particular laptop?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham how many years you went without a laptop computer? A. Well, you can use the iPad as a computer. So it worked fine. I don't know how many years. Two or three. Q. Did you have one iPad or did you have several iPads? A. Just one. Q. And did you have this iPad searched by your attorneys? A. No. Q. Ms. Abraham, were your attorneys aware that your laptop got crushed A. Yes. Q on the American Airlines flight? A. Yes. Q. And taking a look at what's been marked as Abraham Exhibit 2, do you believe this is an authentic e-mail? A. I recall the contents, and I do believe it is authentic, yes. Q. And this is not a document that you

January 17, 2019 Page 62 Page 64 1 Robyn Abraham 1 Robyn Abraham 2 2 VIDEOGRAPHER: The time is Q. And is this a document that you 3 altered in any way? 11:09 a.m. and we're back on the A. No. 4 4 record. 5 Q. Do you recall at any time printing 5 BY MR. LAFAYETTE: 6 out e-mails? 6 Q. Ms. Abraham, did Ms. Rue have access 7 A. No. 7 to your computer? 8 Q. And let me caveat that. That had to 8 MS. SHIN: Objection to form. 9 do with this action. 9 A. I don't think so. 10 A. No. 10 Q. Did she have access to your laptop Q. Do you know if anybody else printed computer at the time she worked for you? 11 11 12 out e-mails having to do with this action for 12 13 13 MS. SHIN: Objection. Can I 14 A. I may have asked Marlene to save all 14 just, if it's okay, do you mean to 15 the documents in a file, because I was 15 say computer? Or account? 16 concerned after Mitch died. But I don't 16 MR. LAFAYETTE: The laptop. 17 know, I can't recall exactly. 17 The physical laptop. 18 Q. And why were you concerned after 18 MS. SHIN: Okay. 19 Mitch died? 19 Q. Did Ms. Rue have access to your 20 A. Why was I concerned after Mitch 20 e-mail account? 21 died? Because he died. When a principal in 21 A. Not that I'm aware of. 22 a contract dies, it's concerning. 22 Q. Can you tell me how it was that she 23 Q. And so simply because he died, you 23 would save your e-mails? 24 decided to have Ms. Rue folder e-mails? 24 A. I may have printed them out to give 25 25 MS. SHIN: Objection to form. to her and just to hold on to. Page 63 Page 65 1 Robyn Abraham 1 Robyn Abraham 2 A. I don't know what -- I don't know 2 Q. Is that the best of your 3 what the question is. 3 recollection? 4 Q. Okay. You testified that you may 4 A. To the best of my recollection, I 5 have asked Marlene to save the e-mails 5 think so. It's been a number of years ago, 6 because you were concerned after Mitch died. 6 so I'm giving you the best of my 7 Was it solely because he died or was there 7 recollection. 8 any other concern that you had? 8 Q. Did you use Microsoft Outlook? 9 A. I, in the ordinary course of 9 10 business, I tried to save important 10 What type of e-mail system did you Q. 11 documents. So I asked her to just save the 11 use? 12 documents. I don't know if she printed them 12 A. Just Go Daddy, and gmail. 13 or she didn't. I don't remember. 13 Q. If you could take a look at what we 14 Q. Did you ask her to do that in 14 marked as Abraham Exhibit 1. And if you look 15 writing? 15 at the second page of that document, in the 16 16 second to the last paragraph of your April A. No. 17 MS. SHIN: Whenever is 17 30th, 4:25 p.m. e-mail, you state, Also, as a 18 convenient for you, can we take a 18 U.S., U.K. attorney solicitor deal maker, it 19 five-minute bathroom break? 19 would be helpful to know whether you own all 20 MR. LAFAYETTE: Sure. We could 20 the rights to MOLM or whether the composer 21 do it right now. 21 and lyricist and/or their respective estates VIDEOGRAPHER: The time is need to be contacted and coordinated. 22 22 23 10:58 a.m. and we are off the record. 23 Do you see that? 24 (Whereupon, a brief recess was 24 A. Yes. 25 taken.) 25 Q. Did Ms. Wasserman ever respond to

Robyn Abraham Robyn Abraham Robyn Abraham A. Yes, but. I don't have Muntain Time. I never use Kountain Time. So that meant be ber timestame, not mine. Q. Oks. Abraham, is this a true and correct copy of an e-mail that you received from Martha Masserman, I'm scorry, as an e-mail that you sent to Wortha Masserman send you sebsite information Robyn Abraham Robyn				
2 12, 2013 at 3:46 p.m.? A. Yes, but I don't have Mountain Time. I Inever use Mountain Time. So that must be her timestamp, not mine. Q. Oksy. And do you recognize this as an e-mail you received from Nartha Wasserman? I'm sorry, as an e-mail that you sent to Nartha Wasserman and I'm sorry, as an e-mail that you sent to Nartha Wasserman? A. It looks familiar. A. It looks familiar. A. Res. I believe so. Jes. Q. Did you create this document? A. No. O. Did you create this document? A. No. O. Did opyocy clee, to your knowledge, create this document? A. No. O. Did onybody clee, to your knowledge, create this document? A. No. O. Did onybody clee, to your knowledge, create this document? A. No. O. Did onybody clee, to your knowledge, create this document? A. No. O. Did onybody clee, to your knowledge, create this document? A. No. O. Did onybody clee, to your knowledge, create this document? A. The believe so. O. Did onybody clee, to your knowledge, create this document? A. The believe so. O. Did onybody clee, to your knowledge, create this document? A. The lieve so. It looks familiar. O. Did onybody clee, to your knowledge, create this document? A. The lieve so. O. Did onybody clee, to your knowledge, create this document? A. The lieve so. It looks familiar. O. Did onybody clee, to your knowledge, create this document? A. The lieve so. O. Did onybody clee, to your knowledge, create this document? A. The lieve so. O. Did onybody clee, to your knowledge, create this document? A. The lieve so. O. Did onybody clee, to your knowledge, create this document? A. The lieve it subthempts the record, this was an e-mail that was produced without a corresponding e-mail that was produced without a corres	1		1	
A. Yes, but I don't have Mountain Time. I never use Mountain Time. So that must be her timestamp, not wine. O. Okay. And do you recognize this as a name of an e-mail you received from Martha Wasserman, I'm scery, as an e-mail that you sent to Martha Wasserman? I'm scery, as an e-mail that you sent to Martha Wasserman send you website information regarding the New York Times cruise, correct? A. I looks familiar. O. And in this e-mail, you request that the Martha Wasserman send you website information regarding the New York Times cruise, correct? A. I believe so. O. Did you create this document? A. No. O. Did anybody else, to your knowledge, create this document? A. No. O. Did anybody else, to your knowledge, create this document? A. I believe it's authentic. O. Looking again, just for the record this was an e-mail that was produced without a corresponding e-mail type document. Is this a document that you printed out for your attorneys? A. I believe so. O. And do you receive this was the record without a corresponding e-mail type document. Is this a document that you printed out for your attorneys? A. I believe so. O. And do you received the solve entry the propose of an e-mail that you received from Martha Wasserman, A. Yes, I believe so. It looks familiar. O. Did you create this document? A. No. O. Did you create this document? A. I believe it's authentic. O. Looking again, just for the record this was une-mail that you printed out for your attorneys? A. I believe so. O. Coking again, just for the record this was une-mail that you printed out for your attorneys? A. I believe so. O. And do you received this you provided the same produced without a corresponding e-mail that you received the solve entry to used to print this out? A. Whatever I had at the time, I recall what computer it was. O. Was it the laptop that got or washed on American Airlines? A. How the provided the e-mail that you received the summer of 2014. O. And on the second page of the document, is this an e-mail that you received the summ		•		•
4 In rever use Mountain Time. So that must be he retinestamp, not mime. 5 her timestamp, not mime. 6 Q. Okay. And do you recognize this as a an e-mail you received from Martha Wasserman, a 'I'm secry, as an e-mail that you sent to 9 Martha Wasserman; 10 A. It looks familiar. 10 A. It looks familiar. 11 Q. And in this e-mail, you request that 11 Q. Did you create this document? 12 Martha Wasserman send you website information 12 regarding the New York Times cruise, correct? 13 A. What's the question? 14 MS. SHIN: Objection to form. 15 A. What's the question? 16 MR. LARATTETE: I'll ask the court reporter to read it back. 17 court reporter to read it back. 18 (Whereupon, at this time, the requested) 19 portion was read by the reporter.) 20 A. Well, she called he about it and all 12 she gave ne was a handout or she sent me a 2 handout or something, so I did ask her for details on the invitation she extended. 21 MR. LARATTETE: I'm going to 2 details on the invitation she extended. 22 mark as Abraham Dehibit 14 a document 23 mark as Abraham, on the first page of 5 email as Abraham Echibit 14 for 1 to Ms. Wasserman? 11 A. It looks familiar, following up on a 12 phone conversation that she asked me if 1 go 12 the information for the cruise. 14 Q. And on the second page of the document, is this an e-mail that you sent to to Ms. Wasserman? 15 A. It looks familiar, following up on a 12 phone conversation that she asked me if 1 go 12 the information for the cruise. 16 (Whereupon, at this time, the 20 And on the second page of the document, is this an e-mail that you received 15 the information for the cruise. 16 (Whereupon, at this time, the 20 And on the second page of the document, is this an e-mail that you received 15 the information for the cruise. 19 (Martha Wasserman? 20 A. I believe at the converted to my attorneys in London probably sometime in summer of 2014. 21 A. It looks familiar. 22 A. I believe at the industry that the increase in the same development that you provided the e-mails to your attorneys 15 and fa		•		-
5 her timestamp, not mime. 6 Q. Okay. And do you recognize this as an e-mail you received from Martha Wasserman. 7 A. T. Looks familiar. 9 Wartha Wasserman? 10 A. T. Looks familiar. 10 A. T. Looks familiar. 11 Q. And in this e-mail, you request that the account reporter to read it back. 12 A. No. 13 A. No. 14 A. No. 15 A. Mat's the question? 14 Ms. SHIN: Objection to form. 15 A. Mat's the question? 16 Ms. LARAYNITE: I'll ask the court reporter to read it back. 17 A. Wall, she called me about it and all she gave me was a handout or she sent me a handout or she sentend a law facilities. 16 A. Watserver I had at the time. 16 A. Watserver I had at th		,	_	
6 Q. And is this an authentic e-mail? 7 an e-mail you received from Martha Wasserman, 8 I'm sorry, as an e-mail that you sent to 9 Martha Wasserman? 10 A. It looks familiar. 11 Q. And in this e-mail, you request that 12 Martha Wasserman send you website information 13 regarding the New York Times cruise, correct? 14 MS. SHIN: Objection to form. 15 A. What's the question? 16 MS. LIARVETTE: ['Il ask the 17 court reporter to read it back. 18 (Whereupon, at this time, the requested 19 portion was read by the reporter.) 20 A. Well, she called me about it and all 21 abe gave me was a handout or she sent me a 22 handout or something, so I did ask her for 23 details on the invitation she extended. 24 MS. LIARVETTE: "m going to 25 mark as Abraham Exhibit 14 a document 26 e-mail as Abraham Exhibit 14 for 27 identification.) 28 MS. Abraham, on the first page of 29 the document, is this on e-mail that you sent 29 to Markaman? 20 A. Well, do you recall what computer which 29 a the information for the cruise. 20 Q. Ms. Abraham is chilbit 14 for 21 document, is this an e-mail that you sent 22 to Ms. LIARVETTE: "m going to 23 defails an e-mail that you sent 24 to Ms. Markaman? 25 e-mail as Abraham Exhibit 14 for 26 identification.) 27 A. Well, do you recate this document? 28 A. I believe it's authentic. 39 Looking again, just for the 30 cut for your attorneys? 30 A. I believe it's authentic. 31 A. I believe it's authentic. 31 A. I believe it's authentic. 32 Looking again, just for the 33 cut for your attorneys? 34 A. I believe it's authentic. 35 A. I believe it's authentic. 36 Looking again, just for the 37 A. Ves. I believe it's authentic. 38 A. I believe it's authentic. 39 A. I believe it's authentic. 30 Looking again, just for the 30 variet actromages of a victorneys? 30 A. I believe it's authentic. 31 A. I believe so. 32 A. I believe so. 40 C. And byou recall what computer you used to form that she adventioned a victorneys in London probably sometime in summer of 2014. 41 A. It looks familiar, following up on a			-	,
an e-mail you received from Martha Wasserman, I'm sorry, as an e-mail that you sent to Martha Wasserman email that you sent to Martha Wasserman email that you request that I Q. And in this e-mail, you request that I Wasserman email you website information regarding the New York Times cruise, correct? M. M. SHIN: Objection to form. M. M. SHIN: Objection to form. M. M. Wasserman email that was produced without a corresponding e-mail type document. If court reporter to read it back. M. Wasterstee, I'll sak the C. Whereupon, at this time, the requested M. LAFAMETTE: I'm going to M. M. LAFAMETTE: I'm going to M. M. Marka Shreham Exhibit 14 a document M. LAFAMETTE: I'm going to M. M. Marka Shreham Exhibit 14 for identification.) M. M. Ti looks familiar, you request that M. Lafametal and the invitation she extended. M. Wasterver I had at the time. I don't mark as Abreham Exhibit 14 for identification.) M. Marka Shreham is an e-mail that you received from Martha Wasserman? M. Lafametal that you request M. M. Lafametal that you received from Martha Wasserman? M. Lafametal that you received M. Lafametal that		- ·	_	
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9 Martha Wasserman? 10 A. It looks familiar. 11 Q. And in this e-mail, you request that 12 Martha Wasserman send you website information 13 regarding the New York Times cruise, correct? 14 MS. SEIN: Objection to form. 15 A. What's the question? 16 A. What's the question? 17 MR. LAFAYETTE: I'll ask the 18 (Whereupon, at this time, the requested 19 portion was read by the reporter.) 19 A. Well, she called me about it and all 21 she gave me was a handout or she sent me a 22 handout or scenething, so I did ask her for 23 details on the invitation she extended. 24 MS. LAFAYETTE: I'm going to 25 mark as Abraham Exhibit 14 a document 26 e-mail as Abraham Exhibit 14 for 27 identification.) 28 Q. No. Abraham 29 ponce conversation that she asked me if I got 19 ponce conversation that she asked me if I got 10 to Ms. Nasserman? 29 A. I clooks gamiliar, following up on a 20 phone conversation that she asked me if I got 20 phone conversation that she asked me if I got 21 the information for the cruise. 22 phone conversation that she asked me if I got 23 phone conversation that she asked me if I got 24 the information for the cruise. 25 mark as Abraham Exhibit 15 a document 26 phone conversation that she asked me if I got 27 the information for the cruise. 28 phone conversation that she asked me if I got 29 the information for the cruise. 30 Q. And on the second page of the 31 document, is this an e-mail that you received 32 from Martha Wasserman? 33 A. I believe this document? 34 A. I don't - I don't the example of the document, is this an e-mail that you received 35 from Martha Wasserman? 36 A. I don't - I don't thave anymore. 37 A. Well, somebody slammed the overhead 38 attorney: 39 A. I don't - I don't renember which 30 Q. And on the second page of the 31 document, is this an e-mail that you received 39 from Martha Wasserman? 30 Q. And on the second page of the 30 document, is this an e-mail that you received 30 from Martha Wasserman? 30 Q. And on the second page of the 31 document is this an e-mail that you received 31 f		· ·		
A. It looks familiar. 10 A. Mad in this e-mail, you request that 11 Martha Masserman send you website information 13 regarding the New York Times cruise, correct? 14 NS. SHIN: Objection to form. 15 A. What's the question? 16 NR. LAPAYETTE: I'll ask the 17 court reporter to read it back. 18 (Marcrupon, at this time, the requested 19 portion was read by the reporter.) 20 A. Well, she called me about it and all 28 she gave me was a handout or something, so I did ask her for 29 details on the invitation she extended. 21 she gave me was a handout or she extended. 22 handout or something, so I did ask her for 29 details on the invitation she extended. 23 handout or something, so I did ask her for 29 details on the invitation she extended. 24 MR. LAFAYETTE: I'm going to 25 mark as Abraham Exhibit 14 a document 25 mark as Abraham as the saked me if I got the document, is this an e-mail that you sent to Ms. Wasserman? 26 Q. Ma. Abraham, on the first page of 5 the document, is this an e-mail that you sent to Ms. Wasserman? 27 A. Ti coposa familiar, following up on a 10 phone conversation that she asked me if I got the information for the cruise. 28 Q. Mad on the second page of the document, is this an e-mail that you received for mark as Abraham Exhibit 15 a document that bears Bates stamps 000091. 30 (Mrereupon, at this time, the 20 phone conversation that she asked me if I got the document, is this an e-mail that you received for mark as Abraham Exhibit 15 a document that bears Bates stamps MR 000576. 31 (Whereupon, at this time, the 29 crushed on American Airlines, correct? 32 A. I don't I don't remember which was that you provided the e-mails to your attorney? 33 A. I don't I don't remember which was that you provided the e-mails to your attorney? 4 A. Was It the laptop did you have at that time? 4 Q. And on the second page of the document, is this an e-mail that you received for Marcha Masserman? 5 A. It appears to be. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 15 for 20 phone for pour time that be a		*	•	
Q. And in this e-mail, you request that Nartha Wasserman send you website information 12				· · · · · · · · · · · · · · · · · · ·
Martha Wasserman send you website information 13 regarding the New York Times cruise, correct? 13 A. I believe it's authentic. 14 MS. SHIN: Objection to form. 15 A. What's the question? 15 A. What's the question? 16 MR. LAFAYETTE: I'll ask the 16 Court reporter to read it back. 17 Court reporter to read it back. 18 (Whereupon, at this time, the requested 19 portion was read by the reporter.) 19 Dearing says as a handout or she sent me a 22 handout or something, so I did ask her for 23 details on the invitation she extended. 24 MR. LAFAYETTE: I'm going to 15 mark as Abraham Exhibit 14 a document 25 mark as Abraham Exhibit 14 a document 26 mark as Abraham, on the first page of 27 the document, is this an e-mail that you sent to to Ms. Masserman? 10 A. It looks familiar, following up on a 12 phone conversation that she asked me if I got the information for the cruise. 19 mark as Abraham Exhibit 15 a document 20 mark as Abraham Exhibit 15 a document 21 mark as Abraham Exhibit 15 a document 22 mark as Abraham Exhibit 15 a document 23 mark as Abraham Exhibit 15 a document 24 mark as Abraham Exhibit 15 a document 25 mark as Abraham Exhibit 15 a document 26 mark as Abraham Exhibit 15 a document 27 mark as Abraham Exhibit 15 a document 28 mark as Abraham Exhibit 15 a document 29 mark as Abraham Exhibit 15 a document 20 mark as Abraham Exhibit 15 a document 21 mark as Abraham Exhibit 15 a document 22 mark as Abraham Exhibit 15 a document 23 mark as Abraham Exhibit 15 a document 24 mark as Abraham Exhibit 15 a document 25 mark as Abraham Exhibit 15 a document 26 mark as Abraham Exhibit 15 a document 27 mark as Abraham Exhibit 15 a document 28 mark as Abraham Exhibit 15 a document 29 mark as Abraham Exhibit 15 for 20 mark as Abraham Exhibit 15 for 21 mark				
13 regarding the New York Times cruise, correct? 14 Ms. SHIN: Objection to form. 15 A. What's the question? 16 MR. LAFAYETTE: I'll ask the 17 court reporter to read it back. 18 (Whereupon, at this time, the requested 19 portion was read by the reporter.) 20 A. Well, she called me about it and all 21 she gave me was a handout or she estended. 22 handout or something, so I did ask her for 23 details on the invitation she extended. 24 MR. LAFAYETTE: I'm going to 25 mark as Abraham Exhibit 14 a document 26 mark as Abraham Exhibit 14 a document 27 Robyn Abraham 28 bearing Bates stamp 0000991. 29 (Whereupon, at this time, the 20 c. Was I the lagtop that got crushed on American Airlines? 29 A. I don't I don't remember which 20 details on the invitation she extended. 21 mark as Abraham Exhibit 14 for 22 identification.) 23 (Whereupon, at this time, the 24 reporter marked the above-mentioned of from Martha Wasseerman? 25 mark as Abraham Exhibit 15 for 26 identification and the second page of the document, is this an e-mail that you sent to to Ms. Kasseerman? 26 A. It appears to be. 27 Ms. LAFAYETTE: I'm going to mark as Abraham Exhibit 15 a document 39 Done conversation that she asked me if I got to the information for the cruise. 30 Ms. Abraham Abraham Exhibit 15 a document 31 A. It appears to be. 32 Ms. LaFAYETTE: I'm going to mark as Abraham Exhibit 15 a document 39 Ms. Abraham Exhibit 15 for 30 Ms. Abraham Exhibit 15 for 31 A. It appears to be. 31 Ms. I appears to be. 32 Ms. Abraham Exhibit 15 for 33 A. The one I don't have amymore. 34 C. Wall, you testified that it got crushed on American Airlines, correct? 39 A. The one I don't have amymore. 40 Ms. LaFAYETTE: I'm going to mark as Abraham Exhibit 15 for 41 Ms. LaFayette is it may be conversed the above-mentioned e-mail as Abraham Exhibit 15 for 42 Ms. Lafayet to mark as Abraham Exhibit 15 for 43 A. Yes. I gave it to my computer expect who tried to pull the data off of it,				
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MR. LAFAYETTE: I'll ask the court reporter to read it back. 15 this a document that you printed out for your attorneys? A. I believe so. Q. And do you recall what computer you used to print this out? A. If believe so. Q. And do you recall what computer you used to print this out? A. Mell, she called me about it and all that you printed out for your attorneys? A. I believe so. Q. And do you recall what computer you used to print this out? A. Matever I had at the time. I don't recall what computer it was. Q. Was it the laptop that got crushed on American Airlines? Page 107 Robyn Abraham Page 108 Page 109 Page		•		
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18 (Whereupon, at this time, the requested 19 portion was read by the reporter.) 20 A. Well, she called me about it and all 21 she gave me was a handout or she sent me a 22 handout or something, so I did ask her for 23 details on the invitation she extended. 24 MR. LAFAYSTTE: I'm going to 25 mark as Abraham Exhibit 14 a document 25 on American Airlines? Page 107 Robyn Abraham 1				
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1	Page 110	1	Page 112
1	Robyn Abraham	1 2	Robyn Abraham
2	Q. Okay. Who is your computer expert?	_	A. Yes.
3	A. Steve Bardfield.	3	Q. And do you see that they both have
4	Q. What is his name?	4	the same subject?
5	A. Steve Bardfield.	5	A. Yes.
6	Q. And where does Mr. Bardfield live?	6	Q. And do you see that they're
7	A. He lives in Studio City, California.	7	apparently two minutes apart?
8	Q. And how do you spell his name?	8	A. I see what they say, yes.
9	A. B-A-R-D-F-I-E-L-D.	9	MR. LAFAYETTE: I'm going to
10	Q. And do you have an address and	10	mark as Abraham Exhibit 16 a document
11	telephone number for Mr. Bardfield?	11	that bears Bates stamps ABR 003104
12	A. I don't have his address. I believe	12	and ABR 003 I'm sorry, let me
13	he's publically listed. I don't know it off	13	start off, it's a document that bears
14	the top of my head.	14	Bates stamps ABR 003104 through ABR
15	Q. What does he do for a living?	15	003107.
16	A. He's a computer expert for I don't	16	(Whereupon, at this time, the
17	know what company. But he works for them	17	reporter marked the above-mentioned
18	full time and then does laptop work for	18	e-mail as Abraham Exhibit 16 for
19	individuals on an as-needed basis.	19	identification.)
20	Q. Okay. Can you provide his telephone	20	MS. SHIN: 16?
21	number to Ms. Shin?	21	MR. LAFAYETTE: Yes.
22	A. My counsel has it.	22	BY MR. LAFAYETTE:
23	Q. And who has possession of the	23	Q. Ms. Abraham, do you recognize what's
24	laptop?	24	been marked as Abraham Exhibit 16?
25	A. He took it.	25	A. I remember this e-mail, yes.
	Page 111		D 112
1		1	Page 113 Robyn Abraham
1 2	Robyn Abraham	1 2	Robyn Abraham
2	Robyn Abraham Q. Does he still have it?	2	Robyn Abraham Q. And do you know why there are three
2 3	Robyn Abraham Q. Does he still have it? A. I don't know.	2 3	Robyn Abraham Q. And do you know why there are three blank pages that follow the cover page of
2 3 4	Robyn Abraham Q. Does he still have it? A. I don't know. Q. Have you asked him for it?	2 3 4	Robyn Abraham Q. And do you know why there are three blank pages that follow the cover page of this e-mail?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robyn Abraham Q. Does he still have it? A. I don't know. Q. Have you asked him for it? A. Well, he said he used it for parts. Q. And when did he tell you that? A. After he took it. He said, Do I have a problem with it, I said, No. He said, It's dead, you can't use it anyway. Q. Have you contacted him since the commencement of this litigation to see if he still maintains the laptop? A. Yes. Q. And what did he say? A. He said it's gone. MR. LAFAYETTE: I'm going to call for production of his telephone number. MS. SHIN: We will take it under advisement. Q. And taking a look at what we've marked now as Abraham Exhibit 15, and the second page of what's been marked as Abraham Exhibit 14, do you see that both of those	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robyn Abraham Q. And do you know why there are three blank pages that follow the cover page of this e-mail? A. I don't know. Q. Is this an authentic e-mail? A. I recall receiving this, and sending it to counsel. So to the best of my knowledge, yes. Q. Just going back to what's been marked as Abraham Exhibit 15, do you believe that to be an authentic e-mail? A. I recognize it, and it looks familiar. So I do believe that to be authentic. Q. Did you create this e-mail? A. No. Q. Do you know if anybody else created this e-mail, other than Ms. Wasserman? A. I was going to say, I believe Ms. Wasserman created this e-mail. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 17 a document bearing Bates stamps ABR 001160
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham Q. Does he still have it? A. I don't know. Q. Have you asked him for it? A. Well, he said he used it for parts. Q. And when did he tell you that? A. After he took it. He said, Do I have a problem with it, I said, No. He said, It's dead, you can't use it anyway. Q. Have you contacted him since the commencement of this litigation to see if he still maintains the laptop? A. Yes. Q. And what did he say? A. He said it's gone. MR. LAFAYETTE: I'm going to call for production of his telephone number. MS. SHIN: We will take it under advisement. Q. And taking a look at what we've marked now as Abraham Exhibit 15, and the second page of what's been marked as Abraham	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham Q. And do you know why there are three blank pages that follow the cover page of this e-mail? A. I don't know. Q. Is this an authentic e-mail? A. I recall receiving this, and sending it to counsel. So to the best of my knowledge, yes. Q. Just going back to what's been marked as Abraham Exhibit 15, do you believe that to be an authentic e-mail? A. I recognize it, and it looks familiar. So I do believe that to be authentic. Q. Did you create this e-mail? A. No. Q. Do you know if anybody else created this e-mail, other than Ms. Wasserman? A. I was going to say, I believe Ms. Wasserman created this e-mail. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 17 a document

1	Page 118 Robyn Abraham	1	Page 120 Robyn Abraham
2	however many versions later.	2	Q. I'm asking if you see that in the
3	MR. LAFAYETTE: I'm going to	3	e-mail.
4	mark as Abraham Exhibit 19, a	4	A. The e-mail says what it says.
5	document bearing Bates stamp ABR	5	Q. Do you see that in the e-mail?
6	000577.	6	A. Yes. I see this.
7	(Whereupon, at this time, the	7	Q. Okay. And who is Helen?
8	reporter marked the above-mentioned	8	A. Well
9	e-mail as Abraham Exhibit 19 for	9	Q. If you know?
10	identification.)	10	A. I didn't write this e-mail. So you
11	BY MR. LAFAYETTE:	11	would have to ask your client.
12	Q. Ms. Abraham, is this an e-mail you	12	Q. Did you know who Ms. Wasserman was
13	received from Martha Wasserman?	13	referring to by Helen?
14	A. I remember receiving something like	14	A. I'm assuming she had met Helen
15	this after receiving something very different	15	Darion although she told me she was
16	like within a short period of time. Because	16	incompetent in a few prior phone calls. So
17	this one is copied to Nan Bases and she	17	I'm assuming she meant Helen Darion, I didn't
18	called and told me that Nan Bases had yelled	18	know of another Helen.
19	at her. So she had to write an e-mail asking	19	Q. When did she tell you that
20	for the hundred thousand up front. Because	20	Ms. Darion was incompetent?
21	she was in trouble with Nan and she didn't	21	A. Oh, fairly on, around probably
22	want to get in trouble with Nan. So I do	22	around late summer, early fall of 2013.
23	remember this e-mail.	23	Q. And this was in a phone
24	Q. And is this a true and correct copy	24	conversation?
0.5	of the e-mail that you received?	25	A. Yes.
25			
25			
25	Page 119		Page 121
1	Page 119 Robyn Abraham	1	Robyn Abraham
1 2	Page 119 Robyn Abraham A. I don't know. I mean, let's put it	2	Robyn Abraham Q. And did anyone overhear your phone
1 2 3	Page 119 Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do	2	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge?
1 2 3 4	Page 119 Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do remember her asking me for one thing and	2 3 4	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge? A. Not that I am aware of. She also
1 2 3 4 5	Page 119 Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do remember her asking me for one thing and sending me one set of e-mails and then	2 3 4 5	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge? A. Not that I am aware of. She also repeated that to me when we went to lunch. I
1 2 3 4 5	Page 119 Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do remember her asking me for one thing and sending me one set of e-mails and then sending me something completely different	2 3 4 5 6	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge? A. Not that I am aware of. She also repeated that to me when we went to lunch. I don't remember which lunch. But she said
1 2 3 4 5 6 7	Page 119 Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do remember her asking me for one thing and sending me one set of e-mails and then sending me something completely different like within a very short period of time. And	2 3 4 5 6 7	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge? A. Not that I am aware of. She also repeated that to me when we went to lunch. I don't remember which lunch. But she said that Helen had owned a very expensive
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1 2 3 4 5 6 7 8 9 10 11 12 13	Page 119 Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do remember her asking me for one thing and sending me one set of e-mails and then sending me something completely different like within a very short period of time. And my calling her and going, What? So she said, well, Nan was yelling at her and she had to ask for the money upfront. Q. And when you say had to ask for the money up front, are you referring to anything in this e-mail?	2 3 4 5 6 7 8 9 10 11 12 13	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge? A. Not that I am aware of. She also repeated that to me when we went to lunch. I don't remember which lunch. But she said that Helen had owned a very expensive apartment in New York and it was dilapidated, and it was a pity because Helen was unable to care for herself. And she went on and on about Helen and explained that that's why Mitch controlled Helen's rights, and that part I very clearly remember. So this was
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do remember her asking me for one thing and sending me one set of e-mails and then sending me something completely different like within a very short period of time. And my calling her and going, What? So she said, well, Nan was yelling at her and she had to ask for the money upfront. Q. And when you say had to ask for the money up front, are you referring to anything in this e-mail? A. Yes. She's putting in this e-mail her hundred thousand nonrefundable advanceoh, I didn't even know she had the calculated potential of revenue per week, that part I don't recall, but, yeah, that was a complete turnaround from what was happening previously.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge? A. Not that I am aware of. She also repeated that to me when we went to lunch. I don't remember which lunch. But she said that Helen had owned a very expensive apartment in New York and it was dilapidated, and it was a pity because Helen was unable to care for herself. And she went on and on about Helen and explained that that's why Mitch controlled Helen's rights, and that part I very clearly remember. So this was like what I got after Nan Bases reportedly yelled at Martha. And then Martha invited me back on the cruise anyway. Q. After you received the e-mail that's been marked as Abraham Exhibit 19, did you continue to contact strike that. After you received the e-mail that's
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham A. I don't know. I mean, let's put it this way. It looks familiar, but I do remember her asking me for one thing and sending me one set of e-mails and then sending me something completely different like within a very short period of time. And my calling her and going, What? So she said, well, Nan was yelling at her and she had to ask for the money upfront. Q. And when you say had to ask for the money up front, are you referring to anything in this e-mail? A. Yes. She's putting in this e-mail her hundred thousand nonrefundable advanceoh, I didn't even know she had the calculated potential of revenue per week, that part I don't recall, but, yeah, that was a complete turnaround from what was happening previously. Q. And moreover in this e-mail she makes reference to pursuing the MOLM proposal and doing business with Mitch and Helen.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham Q. And did anyone overhear your phone conversation, to your knowledge? A. Not that I am aware of. She also repeated that to me when we went to lunch. I don't remember which lunch. But she said that Helen had owned a very expensive apartment in New York and it was dilapidated, and it was a pity because Helen was unable to care for herself. And she went on and on about Helen and explained that that's why Mitch controlled Helen's rights, and that part I very clearly remember. So this was like what I got after Nan Bases reportedly yelled at Martha. And then Martha invited me back on the cruise anyway. Q. After you received the e-mail that's been marked as Abraham Exhibit 19, did you continue to contact strike that. After you received the e-mail that's been marked as Abraham Exhibit 19, did you continue to communicate with Ms. Wasserman? MS. SHIN: Objection to form.
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	Page 122		Page 124
	Robyn Abraham	1	Robyn Abraham
2	A. She continued to call me.	2	A. I don't know if it was my response,
3	Q. And did you communicate to her when	3	but the e-mail looks familiar.
4	she called you?	4	Q. Let me just go back to Exhibit 19
5	A. I'm sorry?	5	for a moment.
6	Q. Did you communicate with her when	6	Is Exhibit 19 an authentic e-mail?
7	she called you?	7	MS. SHIN: Objection to form.
8	A. Well, I answered the phone.	8	A. It appears to be. It's from your
9	Q. And did you speak to her?	9	client.
10	A. Well, she called me, so, yes, I said	10	Q. And did you do anything to alter
11	hello, and I did ask her, I said, Do you want	11	this e-mail from Ms. Wasserman that's been
12	to get Nan on the phone. She said, no, Nan	12	marked as Exhibit 19?
13	yells at her.	13	A. No.
14	Q. And so, therefore, you continued to	14	Q. And this e-mail was not produced in
15	communicate directly with Ms. Wasserman,	15	e-mail format. Is this one of the documents
16	correct?	16	that you gave your attorneys
17	A. I wasn't acting as her attorney. I	17	MS. SHIN: Objection. I'm
18	was acting in a way that she had asked me to	18	going to object to your
19	go to Mitch for whatever it is Martha wanted	19	representation. I don't think that's
20	that day. So I was like, Martha, do you want	20	accurate. But I just wanted to put
21	to get Nan on the phone, no, she'll yell at	21	that on the record.
22	me.	22	MR. LAFAYETTE: Okay.
23	Q. And as of that date, did you know	23	A. I'm sorry, what is the question?
24	that Ms. Wasserman was represented by an	24	Q. My question was, is this one of the
25	attorney?	25	e-mails that you provided to Schillings in
	Page 123		Page 125
1	Robyn Abraham	1	Robyn Abraham
2	Robyn Abraham MS. SHIN: Objection to form.	2	Robyn Abraham 2014?
2 3	Robyn Abraham MS. SHIN: Objection to form. What day?	2 3	Robyn Abraham 2014? A. Which exhibit are you talking about?
2 3 4	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail,	2 3 4	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19.
2 3	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013.	2 3	Robyn Abraham 2014? A. Which exhibit are you talking about?
2 3 4	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail,	2 3 4	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19.
2 3 4 5	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013.	2 3 4 5	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and
2 3 4 5 6	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called	2 3 4 5 6	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha.
2 3 4 5 6 7	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I	2 3 4 5 6 7	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that
2 3 4 5 6 7 8	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what	2 3 4 5 6 7 8	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had.
2 3 4 5 6 7 8 9 10	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question. MS. SHIN: Can we take a	2 3 4 5 6 7 8 9 10	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail?
2 3 4 5 6 7 8 9 10 11	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question.	2 3 4 5 6 7 8 9	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail? A. I believe so.
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2 3 4 5 6 7 8 9 10 11 12 13 14	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question. MS. SHIN: Can we take a five-minute break, whenever you're ready? MR. LAFAYETTE: Very soon.	2 3 4 5 6 7 8 9 10 11 12 13 14	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail? A. I believe so. Q. In the document that we've marked as Exhibit 20, you state that you cannot
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question. MS. SHIN: Can we take a five-minute break, whenever you're ready? MR. LAFAYETTE: Very soon. I will mark as Abraham Exhibit 20 a document that bears Bates stamp ABR 003108.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail? A. I believe so. Q. In the document that we've marked as Exhibit 20, you state that you cannot directly contact Mitch given your longstanding excellent relationship with senior members of ASCAP.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question. MS. SHIN: Can we take a five-minute break, whenever you're ready? MR. LAFAYETTE: Very soon. I will mark as Abraham Exhibit 20 a document that bears Bates stamp ABR 003108. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 20 for	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail? A. I believe so. Q. In the document that we've marked as Exhibit 20, you state that you cannot directly contact Mitch given your longstanding excellent relationship with senior members of ASCAP. Do you see that? A. Are you on the second to bottom paragraph?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question. MS. SHIN: Can we take a five-minute break, whenever you're ready? MR. LAFAYETTE: Very soon. I will mark as Abraham Exhibit 20 a document that bears Bates stamp ABR 003108. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 20 for identification.)	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail? A. I believe so. Q. In the document that we've marked as Exhibit 20, you state that you cannot directly contact Mitch given your longstanding excellent relationship with senior members of ASCAP. Do you see that? A. Are you on the second to bottom paragraph? Q. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question. MS. SHIN: Can we take a five-minute break, whenever you're ready? MR. LAFAYETTE: Very soon. I will mark as Abraham Exhibit 20 a document that bears Bates stamp ABR 003108. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 20 for identification.) BY MR. LAFAYETTE:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail? A. I believe so. Q. In the document that we've marked as Exhibit 20, you state that you cannot directly contact Mitch given your longstanding excellent relationship with senior members of ASCAP. Do you see that? A. Are you on the second to bottom paragraph? Q. Yes. A. Yes, I see it.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham MS. SHIN: Objection to form. What day? Q. As of the day of the e-mail, September 20, 2013. A. I don't remember what day she called me. She called me fairly regularly. So I mean, I saw the e-mail. The e-mail says what it says. So I believe I've answered the question. MS. SHIN: Can we take a five-minute break, whenever you're ready? MR. LAFAYETTE: Very soon. I will mark as Abraham Exhibit 20 a document that bears Bates stamp ABR 003108. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 20 for identification.) BY MR. LAFAYETTE: Q. Is what's been marked as Abraham	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham 2014? A. Which exhibit are you talking about? Q. Exhibit 19. A. This appears to be a true and correct e-mail from Martha. Q. And is this one of the e-mails that you provided to your attorneys? A. Yes. I provided them with everything I had. Q. And did you print out this e-mail? A. I believe so. Q. In the document that we've marked as Exhibit 20, you state that you cannot directly contact Mitch given your longstanding excellent relationship with senior members of ASCAP. Do you see that? A. Are you on the second to bottom paragraph? Q. Yes. A. Yes, I see it. Q. Could you explain why you were

	Ualiuary		2019 120 to 129
	Page 126		Page 128
1	Robyn Abraham	1	Robyn Abraham
2	Q. And in the last line, you say, Of	2	notice that Exhibit 19 does not have the P.S.
3	course, this request expeditiously was	3	that Exhibit 21 has on the second page?
4	approved as well. What were you referring	4	Do you notice that?
5	to?	5	A. No, I just figured there was a page
6	A. I can't recall. I don't I don't	6	missing on this. I don't I mean, if you
7	know what this request expeditiously was	7	point it out, I see what you're saying. But
8	approved as well means.	8	I just figured this continued to another
9	Q. And did you speak to Nan Bases after	9	page.
10	sending this e-mail?	10	Q. So your speculation is that there's
11	MS. SHIN: Objection to form.	11	another page that follows ABR 000577 that
12	A. I don't recall. I know I've spoken	12	would have that P.S. on it?
13	with Nan, but I don't remember the timing of	13	MS. SHIN: Objection to form.
14	when I spoke with Nan.	14	A. I don't know.
15	MR. LAFAYETTE: I'm going to	15	Q. Do you know do you have any
16	mark as Abraham Exhibit 21 a document	16	understanding why what's been marked as
17	bearing Bates stamps W 0000431.	17	Abraham Exhibit 19 is missing the P.S.?
18	MS. SHIN: Before we go into	18	A. I don't know if it is. I just don't
19	that document, it's 1:09. So I don't	19	see it on here. But it may have continued to
20	know, I mean, I can run and do the	20	another page. I don't know.
21	ladies' room real quick if you want	21	Q. Did you edit the document that was
22	to continue and we'll come right	22	marked as Exhibit 19?
23	back.	23	A. No.
24	MR. LAFAYETTE: Okay. Let's do	24	Q. Do you know if anybody else did?
25	that because I just want to finish an	25	A. No. I just figure it got cut off
		1	
	Page 127		Page 129
1	Page 127 Robyn Abraham	1	Page 129 Robyn Abraham
1 2		1 2	_
	Robyn Abraham		Robyn Abraham
2	Robyn Abraham area and then we will go to lunch.	2	Robyn Abraham somewhere.
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	Page 138	1	Page 140
1	Robyn Abraham	1	Robyn Abraham
2	A. Because she told me she would do that if I helped her get this going. And I	2	about five years.
3 4	was asking her to do what she said she was	3	Q. Okay. So for what five-year period
5	going to do.	5	did you have the Samsung? A. Both of them. Oh, for the Samsung,
6	MR. LAFAYETTE: Okay. Let's	6	I probably had it from 2011 until about 2015.
7	take a break.	7	Q. And for what period of time did you
8	MS. SHIN: When should we come	8	have the Edge?
9	back?	9	A. That was from about 2015 to about
10	VIDEOGRAPHER: The time is 1:31	10	2017 or '18.
11	p.m. and we are off the record.	11	Q. Okay. And with respect to your
12	(Whereupon, a brief recess was	12	iPad, did you have an iPad prior to the one
13	taken.)	13	you currently have?
14	VIDEOGRAPHER: The time is 2:28	14	A. No. It's the old model.
15	p.m. and we are back on the record.	15	Q. And with respect to your current
16	BY MR. LAFAYETTE:	16	laptop, how long have you had that?
17	Q. I just want to go back to your	17	A. About a year and a half.
18	computers and handheld devices for a second.	18	Q. And during what period of time did
19	What computers do you currently use?	19	you have the laptop that you said got crushed
20	A. I've got are you talking hand	20	in the overhead bin?
21	held? I've got an iPhone, I've got an iPad,	21	A. That one, probably about four years,
22	and I've got a laptop.	22	from about 2010 to 2014.
23	Q. With respect to the iPad, how long	23	Q. I'm not sure if I asked you this,
24	have you had that iPad?	24	but did you file any written reports about
25	A. Probably four or five years.	25	your laptop getting damaged?
	Page 139	_	Page 141
1	Robyn Abraham	1	Robyn Abraham
2	Robyn Abraham Q. And with respect to your phone, how	2	Robyn Abraham A. I may have, but I remember American
2 3	Robyn Abraham Q. And with respect to your phone, how long have you had that phone?	2	Robyn Abraham A. I may have, but I remember American Airlines said that they weren't going to pay
2 3 4	Robyn Abraham Q. And with respect to your phone, how long have you had that phone? A. This one is new. This one is	2 3 4	Robyn Abraham A. I may have, but I remember American Airlines said that they weren't going to pay for it because they didn't do it, it was
2 3 4 5	Robyn Abraham Q. And with respect to your phone, how long have you had that phone? A. This one is new. This one is probably about eight months old.	2 3 4 5	Robyn Abraham A. I may have, but I remember American Airlines said that they weren't going to pay for it because they didn't do it, it was another passenger. They didn't cause the
2 3 4 5 6	Robyn Abraham Q. And with respect to your phone, how long have you had that phone? A. This one is new. This one is probably about eight months old. Q. Okay. And before that phone, did	2 3 4 5 6	Robyn Abraham A. I may have, but I remember American Airlines said that they weren't going to pay for it because they didn't do it, it was another passenger. They didn't cause the problem.
2 3 4 5 6 7	Robyn Abraham Q. And with respect to your phone, how long have you had that phone? A. This one is new. This one is probably about eight months old. Q. Okay. And before that phone, did you have another phone?	2 3 4 5 6 7	Robyn Abraham A. I may have, but I remember American Airlines said that they weren't going to pay for it because they didn't do it, it was another passenger. They didn't cause the problem. Q. Did they tell you this in writing?
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Page 142 Page 144 1 Robyn Abraham 1 Robyn Abraham 2 2 A. They were moving their suitcase in A. Can you speak up, I'm sorry, I can't 3 and I was on the phone, and they slammed the 3 hear you. 4 overhead bin onto the laptop. 4 Q. During the period of time that you 5 Q. And you don't know the person that 5 had the laptop that got crushed in the 6 did this, do you, the identity of the person 6 overhead bin, could you explain to me how you 7 that did this? 7 would access your e-mail? 8 A. I don't know who it was, and -- no. 8 A. From the phone, from my phone. 9 I didn't know it was broken at the time, it 9 Q. From your phone, you never accessed 10 was in a case. 10 your e-mail through your laptop computer? 11 MR. LAFAYETTE: I'm going to 11 A. Well, when it was crushed, I 12 call for the production of any 12 couldn't. 13 documents concerning this incident 13 Q. Before the time it was crushed I'm 14 with American Airlines. 14 asking. MS. SHIN: I think you already 15 15 A. Yes. I accessed it through the 16 did that, but okay. We will take it 16 computer, the laptop. 17 under advisement. 17 Q. Could you just describe for me when 18 Q. And do you have any knowledge of 18 you opened your computer exactly what you 19 when any of the Go Daddy server crashes may 19 would do to access your e-mail? 20 have occurred? 20 A. Yes. I would have to go on to like 21 A. I gave that to my counsel. I mean, 21 Google or Fox server and then hit the button 22 it was ongoing from 2012 where there was a 22 for the Go Daddy, and then type in my account 23 big one in 2012 and then there were a couple 23 and the pass code. 24 of them along the way. So I don't know the 24 Q. Can you just tell me what the Fox exact dates, but it's all available -- if you 25 25 server was? I'm not familiar with what that Page 143 Page 145 1 Robyn Abraham 1 Robyn Abraham 2 go Google this online, you can find the same 2 is. 3 thing I did. But when I complained about 3 A. I said there was a link on the like 4 things missing, they sent me coupons. 4 Google or Firefox server, and I would hit the 5 Q. And what accounts did you find 5 link and it would show up in a little box, 6 things missing? 6 and then I would put in my e-mail and my 7 A. Well, when I was working on things 7 password. 8 and didn't see them anymore, it was on the 8 Q. And is that the same for HB Global 9 global dot TV and it was also on the 9 as well as the encapsule e-mail? 10 encapsule dot com account. And they were 10 A. They're both the same system but they're different passwords. They're both Go 11 both Go Daddy accounts. 11 12 Q. And did you discover that e-mails 12 Daddy accounts, if that answers your 13 were missing? 13 question. 14 A. Yes. 14 Q. Do you currently still use Go Daddy 15 Q. Did Go Daddy ever acknowledge that 15 for e-mail? 16 any -- did Go Daddy ever acknowledge to you 16 A. Believe it or not, yes, I do. They 17 that any of their server crashes caused you 17 said just change your password. I've had it 18 to lose e-mails? 18 happen on gmail too, so, like I said --19 MS. SHIN: Objection to form. 19 MR. LAFAYETTE: Okay. I'm 20 A. I don't know how to answer that 20 going to mark as Abraham Exhibit 23 a question. They said that there was a problem 21 21 document that bears the Bates stamp 22 they're working on. That's the best they ABR 000578. 22 23 would give me. 23 (Whereupon, at this time, the 24 Q. Now, I want to -- during the period 24 reporter marked the above-mentioned 25 of time that you had the laptop --25 e-mail as Abraham Exhibit 23 for

1			
1	Page 146	1	Page 148
1 2	Robyn Abraham identification.)	1 2	Robyn Abraham
	BY MR. LAFAYETTE:		Q. The e-mail states that you need to
3 4	MS. SHIN: What number is this?	3 4	raise \$100,000 to even begin to discuss this. Do you see that?
5	MS. SHYMAN: 23.	5	A. Yes.
6	BY MR. LAFAYETTE:	6	
7		7	Q. Did you ever raise \$100,000 in connection with Man of La Mancha?
	Q. Is this a true and correct copy of	8	
8	an e-mail that you received from Martha	9	A. No.
10	Wasserman?		Q. Do you know where you were on September 23, 2013?
	A. To the best of my knowledge, yes. O. And is this document authentic?	10	A. I have no idea. I don't know.
11	**	11 12	
12	MS. SHIN: Object to form.		MR. LAFAYETTE: I'm going to
13	Q. Is this an authentic e-mail?	13	mark as Abraham Exhibit 24, a
14	A. To the best of my knowledge, yes.	14	document that bears Bates stamp ABR
15	Q. And did you at any time edit this	15	001165 and ABR 001166.
16	e-mail?	16	(Whereupon, at this time, the
17 18	A. No.	17 18	reporter marked the above-mentioned e-mail as Abraham Exhibit 24 for
	Q. Do you know if anybody else did?		
19	A. I thought it came from Martha	19	identification.)
20	Wasserman, so, no.	20	BY MR. LAFAYETTE:
	Q. On your laptop that you had in 2013,	22	Q. Is this an e-mail that you received from Martha Wasserman?
22	did you have Microsoft Word? A. I don't remember what I had. I had	23	A. I believe so.
24	some kind of Microsoft, I think. It was an	24	
25	Android.	25	Q. In this e-mail, Ms. Wasserman makes it clear that with respect to Man of La
23	Aldroid.	23	it clear that with respect to man of ha
	Page 147		Page 149
1	Robyn Abraham	1	Robyn Abraham
2	Robyn Abraham Q. Your laptop was an Android?	2	Robyn Abraham Mancha, you're proceeding on your own behalf;
2 3	Robyn Abraham Q. Your laptop was an Android? A. It was not a, you know, iMac. So	2 3	Robyn Abraham Mancha, you're proceeding on your own behalf; isn't that correct?
2 3 4	Robyn Abraham Q. Your laptop was an Android? A. It was not a, you know, iMac. So whatever they put on it is what I had.	2 3 4	Robyn Abraham Mancha, you're proceeding on your own behalf; isn't that correct? MS. SHIN: Objection to form.
2 3 4 5	Robyn Abraham Q. Your laptop was an Android? A. It was not a, you know, iMac. So whatever they put on it is what I had. Q. Your laptop was not a Mac?	2 3 4 5	Robyn Abraham Mancha, you're proceeding on your own behalf; isn't that correct? MS. SHIN: Objection to form. A. I think it states what it states in
2 3 4 5 6	Robyn Abraham Q. Your laptop was an Android? A. It was not a, you know, iMac. So whatever they put on it is what I had. Q. Your laptop was not a Mac? A. No, it wasn't a Mac.	2 3 4 5 6	Robyn Abraham Mancha, you're proceeding on your own behalf; isn't that correct? MS. SHIN: Objection to form. A. I think it states what it states in this e-mail.
2 3 4 5 6 7	Robyn Abraham Q. Your laptop was an Android? A. It was not a, you know, iMac. So whatever they put on it is what I had. Q. Your laptop was not a Mac? A. No, it wasn't a Mac. Q. Do you remember what kind of laptop	2 3 4 5 6 7	Robyn Abraham Mancha, you're proceeding on your own behalf; isn't that correct? MS. SHIN: Objection to form. A. I think it states what it states in this e-mail. Q. And did you understand that from
2 3 4 5 6 7 8	Robyn Abraham Q. Your laptop was an Android? A. It was not a, you know, iMac. So whatever they put on it is what I had. Q. Your laptop was not a Mac? A. No, it wasn't a Mac. Q. Do you remember what kind of laptop it was?	2 3 4 5 6 7 8	Robyn Abraham Mancha, you're proceeding on your own behalf; isn't that correct? MS. SHIN: Objection to form. A. I think it states what it states in this e-mail. Q. And did you understand that from this e-mail?
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1	Page 158	1	Page 160
1	Robyn Abraham	1	Robyn Abraham
2	advised by Ms. Wasserman not to correspond	2	Q. In any of those subsequent
3	with her that you continued to correspond	3	conversations.
4	with her as demonstrated by this e-mail?	4	A. Well, that was kind of why she
5	MS. SHIN: Objection to form.	5	wanted me to go on the Christmas cruise. So
6	THE WITNESS: Should I answer?	6	I don't, you know, I spoke with her and
7	MS. SHIN: Yes. If you	7	answered whatever questions she had.
8	understood it.	8	MR. LAFAYETTE: I'm going to
9	A. Yes. Because she kept calling me	9	mark as Abraham Exhibit 28 an e-mail
10	and asking me for advice.	10	that bears the Bates stamp ABR
11	Q. And did she call you between	11	001173. And actually it continues on
12	September 23, 2013 and October 3, 2013 to ask	12	to ABR 001174.
13	you for advice?	13	(Whereupon, at this time, the
14	MS. SHIN: Objection to form.	14	reporter marked the above-mentioned
15	A. I don't know the exact dates. But I	15	e-mail as Abraham Exhibit 28 for
16	do recall she continued to continue our	16	identification.)
17	relationship.	17	BY MR. LAFAYETTE:
18	MR. LAFAYETTE: I'm going to	18	Q. Is Abraham Exhibit 28 a true and
19	mark as Abraham Exhibit 27, a	19	correct copy of the e-mail you received from
20	document that bears Bates stamp ABR	20	Martha Wasserman?
21	000579.	21	A. I suspect so. I don't have a direct
22	(Whereupon, at this time, the	22	recollection of this one in particular. But
23	reporter marked the above-mentioned	23	I do remember receiving a number of e-mails
24	e-mail as Abraham Exhibit 27 for	24	from Martha during these days that were
25	identification.)	25	contrary when Nan was copied. So
	Page 159		Page 161
1	Page 159 Robyn Abraham	1	Page 161 Robyn Abraham
1 2	_	1 2	<u> </u>
	Robyn Abraham		Robyn Abraham
2	Robyn Abraham BY MR. LAFAYETTE: Q. Is what's been marked as Abraham Exhibit 27 a true and correct copy of an	2	Robyn Abraham Q. But she does ask you to contact Nan
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Page 210 Page 212 1 Robyn Abraham 1 Robyn Abraham 2 2 asked Lisa to bring it in. I don't remember seeing his power of attorney and it 3 if this was the first meeting or the second 3 referenced Man of La Mancha. I remember 4 meeting, and she brought it in. And it said 4 those three points. 5 Helen Darion, Mitch Leigh, and he flipped 5 Q. When was the next time subsequent to 6 through it and showed me his signature, and 6 January 6, 2014 that you spoke to Alan Honig? 7 he said, See, I own everything. I said, 7 A. I don't think I spoke with him. I 8 well, you don't own everything because it's 8 think I may have sent him an e-mail asking 9 two out of three. It's me and Helen Darion, 9 about due diligence on Man of La Mancha and 10 so what I say goes. 10 what was done, and who owned what. I may 11 Q. And you said you don't recall if it have tried to call him. I remember him not 11 12 was a first meeting or a second meeting with being happy I called him from the car, 12 13 Mr. Leigh? 13 because there was a lot of noise and he 14 A. Mitch, right. It wasn't in San 14 didn't like that. He was like, Well, if 15 Francisco, it was in his office. 15 you've got something to say go to an office 16 Q. So it was the first meeting, you 16 so I can hear you. 17 believe? 17 And I asked him very specifically 18 A. I don't think so. 18 about the stage rights, London, Broadway, 19 Q. So in that second meeting, was there 19 movie rights, any other contracts that had 20 any phone call to Mr. Honig? 20 been signed, and I asked him about Tam's, 21 A. No. 21 Woodmark and Musicscope, and who owned what, 22 22 Q. Was Mr. Honig present? and whether the rights were available. 23 23 MR. LAFAYETTE: Okay. Why A. No, he was not present. 24 24 don't we take a ten-minute break? Q. Can you describe for me in any more 25 25 VIDEOGRAPHER: The time is 4:35 detail the document that Mr. Leigh showed Page 211 Page 213 1 Robyn Abraham 1 Robyn Abraham 2 you? 2 p.m. and we are off the record. 3 A. Well, it looked like a power of 3 (Whereupon, a brief recess was 4 attorney. It was maybe about ten pages long. 4 taken.) 5 And I saw Helen Darion, I saw his name, and VIDEOGRAPHER: The time is 4:50 6 just really just glanced at it. I asked him 6 p.m. and we are back on the record. 7 for a copy, and he said, No, you can't have 7 MR. LAFAYETTE: I'm going to 8 it. And that was it. 8 mark as Abraham Exhibit 36 a document 9 Q. And did you -- did the document say 9 bearing Bates stamp ABR 000431. 10 power of attorney on it? 10 (Whereupon, at this time, the 11 A. It said power of attorney, Helen 11 reporter marked the above-mentioned 12 12 e-mail as Abraham Exhibit 36 for 13 Q. There was a title on it that said 13 identification.) 14 power of attorney? 14 BY MR. LAFAYETTE: 15 A. Power of attorney, and underneath it 15 O. Ms. Abraham, is this a true and 16 correct copy of an e-mail chain that was said Helen Darion. 16 17 Q. Do you know what date that document 17 forwarded to you by Beverly Diamond on 18 was dated? 18 December 16, 2013? 19 A. I think it was like late 1990s. 19 A. I vaguely remember this. I kind of 20 Q. And do you recall any of the wording 20 tuned out on real estate. But it looks 21 of that document? 21 familiar, so I -- if you got it from me, I 22 22 assume it's correct. A. No. He made sure I didn't -- I 23 wasn't able to read the whole thing, but it 23 Q. And is this one of the documents 24 was signed and countersigned. It may have 24 that you provided to your attorneys at 25 said Helen and Joe Darion, but I do remember 25 Schillings?

	Page 214		Page 216
1	Robyn Abraham	1	Robyn Abraham
2	A. Yes. Whatever I had, I sent them	2	something about Abraham Exhibit 36. Could
3	everything.	3	you go back to that document?
4	Q. Okay. And do you recall if this	4	A. Yes.
5	document was not in e-mail form, do you	5	Q. Did you edit or alter this document
6	recall if you printed this document out?	6	at all?
7	A. I don't recall how it got to	7	A. No, I don't even know if I recognize
8	Schillings. But it got to Schillings, so	8	it. But I didn't alter or edit anything.
9	I if it didn't come from a forward, it was	9	Q. Okay. And is this a true and
10	printed out by me.	10	correct copy of the e-mail that was forwarded
11	Q. And can I just how did you	11	to you by Beverly Diamond, e-mail chain that
12	after you printed the documents out, how did	12	was forwarded to you by Beverly Diamond?
13	you get them to Schillings? Did you scan	13	A. It says it was forwarded, so I'm
14	them and send them?	14	assuming she had sent me whatever this is.
15	A. They were scanned in.	15	Q. Okay. An if you'll take a look at
16	Q. And sent to them?	16	what was marked as Abraham Exhibit 39?
17	A. Yes.	17	A. I don't have 39.
18	Q. And you used a scanner for that?	18	Q. I'm sorry, if you can take a look at
19	A. Yes.	19	what's been marked as Abraham Exhibit 38.
20	Q. Did you ever convert any documents	20	And if you could look at the e-mail from
21	to a PDF form?	21	on the second page from Beverly Diamond to
22	MS. SHIN: Objection to form.	22	Tom Bavino CCing you, dated December 16, 2013
23	A. Pardon me?	23	at 2:01 p.m.
24	MS. SHIN: Objection to form.	24	Do you see that? Do you see that
25	A. Not that I recall.	25	e-mail?
	Page 215		Page 217
1	Page 215 Robyn Abraham	1	Page 217 Robyn Abraham
1 2		1 2	
2 3	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document		Robyn Abraham A. Yes. Q. And if you can go back to Abraham
2 3 4	Robyn Abraham MR. LAFAYETTE: I'm going to	2	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from
2 3 4 5	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the	2 3	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at
2 3 4 5 6	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned	2 3 4 5 6	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from
2 3 4 5 6 7	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for	2 3 4 5 6 7	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes.
2 3 4 5 6 7 8	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.)	2 3 4 5 6 7 8	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the
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2 3 4 5 6 7 8 9	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is this a copy of an	2 3 4 5 6 7 8	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the last sentence of that, the second to last sentence in that e-mail, which says, Please
2 3 4 5 6 7 8 9 10	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is this a copy of an e-mail chain that you were copied on by	2 3 4 5 6 7 8 9 10	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the last sentence of that, the second to last sentence in that e-mail, which says, Please let me know, begins with, Please let me know.
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2 3 4 5 6 7 8 9 10 11 12 13 14	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is this a copy of an e-mail chain that you were copied on by Beverly Diamond? A. I don't know. As I said, the contents look familiar. But I don't think	2 3 4 5 6 7 8 9 10 11 12 13 14	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the last sentence of that, the second to last sentence in that e-mail, which says, Please let me know, begins with, Please let me know. Do you see that? A. Yes. Q. And do you know why the sentences in
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is this a copy of an e-mail chain that you were copied on by Beverly Diamond? A. I don't know. As I said, the contents look familiar. But I don't think this is one of my documents. MR. LAFAYETTE: And I'm going to mark as exhibit Abraham Exhibit 38	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the last sentence of that, the second to last sentence in that e-mail, which says, Please let me know, begins with, Please let me know. Do you see that? A. Yes. Q. And do you know why the sentences in exhibit those sentences in Exhibit 36 and Exhibit 38 are different? A. No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is this a copy of an e-mail chain that you were copied on by Beverly Diamond? A. I don't know. As I said, the contents look familiar. But I don't think this is one of my documents. MR. LAFAYETTE: And I'm going to mark as exhibit Abraham Exhibit 38 a two-page document that bears Bates	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the last sentence of that, the second to last sentence in that e-mail, which says, Please let me know, begins with, Please let me know. Do you see that? A. Yes. Q. And do you know why the sentences in exhibit those sentences in Exhibit 36 and Exhibit 38 are different? A. No. (Witness peruses document.)
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is this a copy of an e-mail chain that you were copied on by Beverly Diamond? A. I don't know. As I said, the contents look familiar. But I don't think this is one of my documents. MR. LAFAYETTE: And I'm going to mark as exhibit Abraham Exhibit 38 a two-page document that bears Bates stamps ABR 001201 and ABR 001202. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 38 for	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the last sentence of that, the second to last sentence in that e-mail, which says, Please let me know, begins with, Please let me know. Do you see that? A. Yes. Q. And do you know why the sentences in exhibit those sentences in Exhibit 36 and Exhibit 38 are different? A. No. (Witness peruses document.) A. No, I don't. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 39 a document that bears Bates stamps ABR 000580.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 37 a document that's Bates stamped Leigh 000249. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 37 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is this a copy of an e-mail chain that you were copied on by Beverly Diamond? A. I don't know. As I said, the contents look familiar. But I don't think this is one of my documents. MR. LAFAYETTE: And I'm going to mark as exhibit Abraham Exhibit 38 a two-page document that bears Bates stamps ABR 001201 and ABR 001202. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 38 for identification.)	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham A. Yes. Q. And if you can go back to Abraham Exhibit 36, and do you see the e-mail from Beverly Diamond to Tom Bavino CCing you at December 16, 2013 at 2:01 p.m.? A. Yes. Q. Okay. And if you would look at the last sentence of that, the second to last sentence in that e-mail, which says, Please let me know, begins with, Please let me know. Do you see that? A. Yes. Q. And do you know why the sentences in exhibit those sentences in Exhibit 36 and Exhibit 38 are different? A. No. (Witness peruses document.) A. No, I don't. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 39 a document that bears Bates stamps ABR 000580. (Whereupon, at this time, the
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	Page 222		Page 224
1	Robyn Abraham	1	Robyn Abraham
2	up?	2	A. Beverly told me that.
3	A. No. I mean, whatever I wrote up was	3	Q. Okay.
4	sent back to Lisa for his comments.	4	MR. LAFAYETTE: I'm going to
5	Q. In an e-mail?	5	mark as Abraham Exhibit 42 a document
6	A. I don't remember how it was	6	bearing Bates stamp ABR 003145.
7	provided, but I do remember that whatever he	7	Strike that, I'm going to do a
8	dictated was sent back. It may have been	8	different one. I'm going to mark as
9	faxed to him, I don't recall exactly how it	9	Abraham Exhibit 42 a document bearing
10	was provided. But it was provided in a draft	10	Bates stamps ABR 006608.
11	form for his review.	11	(Whereupon, at this time, the
12	Q. Was it a draft agreement for his	12	reporter marked the above-mentioned
13	review?	13	e-mail as Abraham Exhibit 42 for
14	A. It was a draft agreement.	14	identification.)
15	Q. And that would have been sent by you	15	BY MR. LAFAYETTE:
16	to Mr. Leigh?	16	O. Ms. Abraham, is the e-mail on the
17	A. It would have been sent from me to	17	top of the page, dated January 10, 2014,
18	his office. He didn't do his own e-mail or	18	10:21 a.m. a true and correct copy of an
19	he had Lisa review everything.	19	e-mail that you sent to Martha Wasserman?
20	MR. LAFAYETTE: I'm going to	20	A. To the best of my knowledge, yes.
21	mark as Abraham Exhibit 41 a document	21	O. Is this an authentic document?
22		22	•
23	that bears Bates stamps ABR 000438.	23	MS. SHIN: Objection to form. A. To the best of my knowledge, yes.
24	(Whereupon, at this time, the reporter marked the above-mentioned	24	O. And the e-mail at the bottom of the
25	e-mail as Abraham Exhibit 41 for	25	~
⊿5	e-mail as Abraham Exhibit 41 for	25	page, is this a true and correct copy of an
	Page 223		Page 225
1	Page 223 Robyn Abraham	1	Page 225 Robyn Abraham
1 2	=	1 2	_
	Robyn Abraham		Robyn Abraham
2	Robyn Abraham identification.)	2	Robyn Abraham e-mail that was sent to you by Martha
2 3	Robyn Abraham identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, can you tell me how you received this e-mail?	2	Robyn Abraham e-mail that was sent to you by Martha Wasserman on January 10, 2014 at 11:58 a.m.?
2 3 4	Robyn Abraham identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, can you tell me how you	2 3 4	Robyn Abraham e-mail that was sent to you by Martha Wasserman on January 10, 2014 at 11:58 a.m.? A. To the best of my knowledge, yes.
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2 3 4 5 6	Robyn Abraham identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, can you tell me how you received this e-mail? A. Beverly occasionally would forward	2 3 4 5 6	Robyn Abraham e-mail that was sent to you by Martha Wasserman on January 10, 2014 at 11:58 a.m.? A. To the best of my knowledge, yes. Q. And is this one of the documents that you printed out and provided your
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2 3 4 5 6 7 8 9 10 11	Robyn Abraham identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, can you tell me how you received this e-mail? A. Beverly occasionally would forward e-mails to me and CC or BCC me. I don't know how I got this particular one. She may have given me a copy. I don't remember specifically exactly how I got this one. Q. Okay. And is this an authentic e-mail to your understanding?	2 3 4 5 6 7 8 9 10 11 12	Robyn Abraham e-mail that was sent to you by Martha Wasserman on January 10, 2014 at 11:58 a.m.? A. To the best of my knowledge, yes. Q. And is this one of the documents that you printed out and provided your attorneys? A. To the best of my knowledge, yes. Q. Okay. And you notice that the well, let me ask you this. Is the e-mail on the bottom Mrs. Wasserman's response to your e-mail at
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Robyn Abraham identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, can you tell me how you received this e-mail? A. Beverly occasionally would forward e-mails to me and CC or BCC me. I don't know how I got this particular one. She may have given me a copy. I don't remember specifically exactly how I got this one. Q. Okay. And is this an authentic e-mail to your understanding? A. Well, I didn't write it MS. SHIN: Objection to the form. A. To the best of my knowledge, yes. Q. Did you create this e-mail? A. No. Q. Do you know anyone other than	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Robyn Abraham e-mail that was sent to you by Martha Wasserman on January 10, 2014 at 11:58 a.m.? A. To the best of my knowledge, yes. Q. And is this one of the documents that you printed out and provided your attorneys? A. To the best of my knowledge, yes. Q. Okay. And you notice that the well, let me ask you this. Is the e-mail on the bottom Mrs. Wasserman's response to your e-mail at the top of the page? A. I don't know. Q. Does it appear to be? A. I don't know. Q. If you notice it, they both have the same subject matter line, correct? A. Yes, I see they have the same
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robyn Abraham identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, can you tell me how you received this e-mail? A. Beverly occasionally would forward e-mails to me and CC or BCC me. I don't know how I got this particular one. She may have given me a copy. I don't remember specifically exactly how I got this one. Q. Okay. And is this an authentic e-mail to your understanding? A. Well, I didn't write it MS. SHIN: Objection to the form. A. To the best of my knowledge, yes. Q. Did you create this e-mail? A. No. Q. Do you know anyone other than Beverly Diamond that may have created this e-mail?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robyn Abraham e-mail that was sent to you by Martha Wasserman on January 10, 2014 at 11:58 a.m.? A. To the best of my knowledge, yes. Q. And is this one of the documents that you printed out and provided your attorneys? A. To the best of my knowledge, yes. Q. Okay. And you notice that the well, let me ask you this. Is the e-mail on the bottom Mrs. Wasserman's response to your e-mail at the top of the page? A. I don't know. Q. Does it appear to be? A. I don't know. Q. If you notice it, they both have the same subject matter line, correct? A. Yes, I see they have the same subject matter. Q. Okay. And you notice that in the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, can you tell me how you received this e-mail? A. Beverly occasionally would forward e-mails to me and CC or BCC me. I don't know how I got this particular one. She may have given me a copy. I don't remember specifically exactly how I got this one. Q. Okay. And is this an authentic e-mail to your understanding? A. Well, I didn't write it MS. SHIN: Objection to the form. A. To the best of my knowledge, yes. Q. Did you create this e-mail? A. No. Q. Do you know anyone other than Beverly Diamond that may have created this e-mail? A. My understanding was Beverly had sent this e-mail to Lisa Maldenado.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robyn Abraham e-mail that was sent to you by Martha Wasserman on January 10, 2014 at 11:58 a.m.? A. To the best of my knowledge, yes. Q. And is this one of the documents that you printed out and provided your attorneys? A. To the best of my knowledge, yes. Q. Okay. And you notice that the well, let me ask you this. Is the e-mail on the bottom Mrs. Wasserman's response to your e-mail at the top of the page? A. I don't know. Q. Does it appear to be? A. I don't know. Q. If you notice it, they both have the same subject matter line, correct? A. Yes, I see they have the same subject matter. Q. Okay. And you notice that in the bottom e-mail, where it says to R. Abraham, there is quotes around R. Abraham, both in

1	Page 226 Robyn Abraham	1	Page 228 Robyn Abraham
2	Q. And at the top e-mail you see R.	2	Q. Did you create the e-mail from
3	Abraham. There is no quote before the R and	3	Martha Wasserman to yourself?
4	there is a quote after the word Abraham in	4	A. No.
5	the from line?	5	MR. LAFAYETTE: I'm going to
6	A. I see what it says.	6	mark as Abraham Exhibit 43 a document
7	Q. Okay. Do you know why that would	7	that's Bates stamped ABR 000489.
8	be?	8	(Whereupon, at this time, the
9	A. No, I do not.	9	reporter marked the above-mentioned
10	Q. And in your experience, is an e-mail	10	e-mail as Abraham Exhibit 43 for
11	that responds to another e-mail on the top of	11	identification.)
12	the page or at the bottom of the page?	12	BY MR. LAFAYETTE:
13	MS. SHIN: Objection to form.	13	O. Ms. Abraham, is this a true and
14	A. I don't know.	14	correct copy of an e-mail that you received
15	O. Let me reword that.	15	from Lisa Maldenado on January 15, 2014?
16	In your experience, when someone	16	
17	responds to an e-mail, does that e-mail	17	A. According to what it says, I suspect it is, yes.
18	appear above the e-mail to which it is	18	Q. Okay. And is it an authentic
19	responding?	19	e-mail
20	A. I don't know.	20	MS. SHIN: Objection.
21	Q. Have you ever seen an e-mail where	21	Q to your understanding?
22	the e-mail responding to an e-mail is on the	22	MS. SHIN: Objection to form.
23	bottom?	23	A. It's what Mitch told me as well, so
24	MS. SHIN: Objection to form.	24	I believe it is accurate.
25	A. I	25	MR. LAFAYETTE: I'm going to
1	Page 227	1	Page 229
2	Robyn Abraham O. Other than this instance?	2	Robyn Abraham mark as Abraham Exhibit 44 an
1 4			
	~		
3	A. I haven't looked for one before, so	3	e-mail I'm sorry, a document which
3 4	A. I haven't looked for one before, so I really don't know.	3 4	e-mail I'm sorry, a document which is Bates stamped ABR 003112.
3 4 5	A. I haven't looked for one before, so I really don't know. Q. Does this seem peculiar to you?	3 4 5	e-mail I'm sorry, a document which is Bates stamped ABR 003112. (Whereupon, at this time, the
3 4 5 6	A. I haven't looked for one before, so I really don't know. Q. Does this seem peculiar to you? MS. SHIN: Objection to form.	3 4 5 6	e-mail I'm sorry, a document which is Bates stamped ABR 003112. (Whereupon, at this time, the reporter marked the above-mentioned
3 4 5 6 7	A. I haven't looked for one before, so I really don't know. Q. Does this seem peculiar to you? MS. SHIN: Objection to form. A. After what I've been through with Go	3 4 5 6 7	e-mail I'm sorry, a document which is Bates stamped ABR 003112. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 44 for
3 4 5 6 7 8	A. I haven't looked for one before, so I really don't know. Q. Does this seem peculiar to you? MS. SHIN: Objection to form. A. After what I've been through with Go Daddy, no, nothing seems peculiar to me, no.	3 4 5 6 7 8	e-mail I'm sorry, a document which is Bates stamped ABR 003112. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 44 for identification.)
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I haven't looked for one before, so I really don't know. Q. Does this seem peculiar to you? MS. SHIN: Objection to form. A. After what I've been through with Go Daddy, no, nothing seems peculiar to me, no. Q. So you believe this is an issue with Go Daddy? A. Well, I don't know. I'm not an IT person. Q. And is this are these authentic e-mails? MS. SHIN: Objection to form. A. To the best of my knowledge, yes. Q. Did you type both of these e-mails? A. I didn't type I probably sent the Friday e-mail, because it says I did. That's it. Q. The Friday e-mail at the A. To Martha.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	e-mail I'm sorry, a document which is Bates stamped ABR 003112. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 44 for identification.) BY MR. LAFAYETTE: Q. Ms. Abraham, is the top e-mail a true and correct copy of an e-mail that you sent to Martha Wasserman on January 20, 2014, at 11:08 a.m.? (Witness peruses document.) A. It looks accurate to the best of my knowledge. Q. And is the e-mail on the bottom of the page an e-mail that you received from Martha Wasserman on January 20, 2014? A. To the best of my knowledge, yes. Q. And is it a true and correct copy? A. To the best of my knowledge, yes.

	Page 230		Page 232
1	Robyn Abraham	1	Robyn Abraham
2	reflected in this document?	2	familiar that I had, yes.
3	A. No.	3	Q. The one that's at 10:19 a.m. at the
4	Q. Do you know if anybody else did	4	top of the page?
5	other than Martha Wasserman?	5	A. Yes.
6	A. I believe Martha Wasserman sent me	6	Q. And is that an authentic e-mail?
7	what she sent me.	7	A. I can't hear you.
8	Q. And, again, if you look at the is	8	MS. SHIN: Objection to form.
9	the bottom e-mail a response to the top	9	Q. Is that an authentic e-mail?
10	e-mail, to your knowledge?	10	MS. SHIN: Objection to the
11	A. I don't know.	11	form.
12	Q. And can I ask you why were you still	12	A. To the best of my knowledge, yes.
13	communicating directly with Martha Wasserman	13	Q. And is the e-mail at the bottom from
14	on January 20, 2014 when she had earlier	14	Dale Wasserman at cox dot net to R. Abraham,
15	requested that you only correspond with her	15	is that a response by Martha Wasserman to
16	attorney?	16	your e-mail, to your knowledge?
17	MS. SHIN: Objection to form.	17	A. I don't know if it's a response, but
18	A. Because Martha would send that, copy	18	it does look familiar.
19	Nan, and then call me a day or two later and	19	Q. And again, at the top of the page,
20	ask me what's going on. And I wasn't	20	there's no quotation mark in the from before
21	representing Martha as a lawyer. So she	21	R. Abraham.
22	wanted to know what was going on, so I let	22	Do you see that?
23	her know what was going on.	23	A. Yes.
24	Q. Do you know why this document does	24	Q. Do you know why that is?
25	not exist in e-mail format?	25	A. No.
	Page 231		Page 233
			Page 233
1	Robyn Abraham	1	Robyn Abraham
1 2	Robyn Abraham MS. SHIN: Objection to form.	1 2	Robyn Abraham Q. Do you know why there's no re in the
	-	2 3	Robyn Abraham
2 3 4	MS. SHIN: Objection to form. Foundation. A. I do not.	2 3 4	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No.
2 3	MS. SHIN: Objection to form. Foundation. A. I do not. MR. LAFAYETTE: I'm going to	2 3	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No. Q. Do you know why the e-mail at the
2 3 4	MS. SHIN: Objection to form. Foundation. A. I do not. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 45, a one	2 3 4	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No. Q. Do you know why the e-mail at the bottom why strike that.
2 3 4 5	MS. SHIN: Objection to form. Foundation. A. I do not. MR. LAFAYETTE: I'm going to	2 3 4 5	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No. Q. Do you know why the e-mail at the bottom why strike that. And going back to Abraham Exhibit
2 3 4 5 6	MS. SHIN: Objection to form. Foundation. A. I do not. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 45, a one page document which is Bates stamped ABR 003113.	2 3 4 5 6	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No. Q. Do you know why the e-mail at the bottom why strike that.
2 3 4 5 6 7 8	MS. SHIN: Objection to form. Foundation. A. I do not. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 45, a one page document which is Bates stamped	2 3 4 5 6 7	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No. Q. Do you know why the e-mail at the bottom why strike that. And going back to Abraham Exhibit 44, again, if you look at the top of the page in the from line there's no quotation mark
2 3 4 5 6 7 8 9	MS. SHIN: Objection to form. Foundation. A. I do not. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 45, a one page document which is Bates stamped ABR 003113. (Whereupon, at this time, the reporter marked the above-mentioned	2 3 4 5 6 7 8	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No. Q. Do you know why the e-mail at the bottom why strike that. And going back to Abraham Exhibit 44, again, if you look at the top of the page in the from line there's no quotation mark before R. Abraham.
2 3 4 5 6 7 8 9 10	MS. SHIN: Objection to form. Foundation. A. I do not. MR. LAFAYETTE: I'm going to mark as Abraham Exhibit 45, a one page document which is Bates stamped ABR 003113. (Whereupon, at this time, the reporter marked the above-mentioned e-mail as Abraham Exhibit 45 for	2 3 4 5 6 7 8 9 10	Robyn Abraham Q. Do you know why there's no re in the subject matter of the e-mail on the bottom? A. No. Q. Do you know why the e-mail at the bottom why strike that. And going back to Abraham Exhibit 44, again, if you look at the top of the page in the from line there's no quotation mark
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